



### Learning from Incidents - Protips Part 6: Fitness for Duty

In 2022, the Occupational Safety and Health Administration defined being Fit for Duty as: “a physical, mental, and emotional state which enables the employee to perform the essential tasks of his or her work assignment in a manner which does not threaten the safety or health of oneself, co-workers, property, or the public.” In other words, it’s not just about fatigue, alcohol, and drugs; the person’s physical, physiological, and psychological states are all factors, as well as the persons’ ability to communicate with and understand his or her coworkers and work instructions.

Being considered FFD at the beginning of a work shift and being FFD before a critical task may be two different things. Within any given shift, a person may be anywhere along the Fit for Duty continuum.

So what does this mean in the context of investigating incidents?

Human Error is a causal factor in 80%

of all incident investigations\*. As we begin collecting data after an incident that involves human performance, there are a number of areas that should form part of the investigation in order to address whether the employee was FFD or

not. The table shown here illustrates some of the evidence to look into within the Fit for Duty categories.



Referring to Figure 1, we can see that depending on the person’s mental alertness, psychological and physical well-being along with other psychosocial

attributes, the ability to perform at the highest level may be impaired. Even the length of time since the last substantial sleep, that being at least 4 hours, has the ability to change a person’s capacity to make good decisions. The fatigue that has been demonstrated after being awake for 16 hours is equivalent to a blood alcohol level of 0.08, and that is only if you have not accumulated a sleep debt which only en-

Fit for Duty		
<b>Physical</b> <ul style="list-style-type: none"> <li>• Temperature / weather</li> <li>• Ventilation of the work site</li> <li>• Pre-existing injuries / illnesses</li> </ul>	<b>Physiological</b> <ul style="list-style-type: none"> <li>• Time Sheets</li> <li>• Drug tests</li> <li>• Air quality testing</li> </ul>	<b>Psychological</b> <ul style="list-style-type: none"> <li>• Emails etc.</li> <li>• Employment Records</li> <li>• Indirect witnesses</li> <li>• Phone records*</li> </ul>
<b>Communication</b> <ul style="list-style-type: none"> <li>• Language barriers</li> <li>• Line of sight of parties involved</li> </ul>		

hances the impairment affect. The person’s ability to make quick, informed decisions is therefore slowed and results in making more than the 5 to 8 mistakes that a competent, FFD individual would make.

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When we analyze the behaviors noted in the investigation and we ascertain whether each undesirable action was a Slip, Lapse, Mistake, or a Violation, we must remember that all categories can be compounded by FFD issues; this includes both inadvertent at-risk actions as well as deliberate at-risk actions.

The critical consideration that needs to be assessed is whether the evidentiary basis is sufficient to differentiate between a slip, lapse, mistake or violation and if the impacts of FFD had any bearing on the outcome of the incident.

Almost equally important is understanding where the incident investigators are on the Fit for Duty spectrum, as decision-making, critical thinking, attitude, and cooperation are all necessary for a successful incident investigation and are all impacted by a person’s placement on the FFD continuum.

\*Source: IOGP Report 453 – Safety Leadership in Practice: A Guide for Managers, Oct. 2019

## vPSI's Most Recent SPE Papers



Over the years, members of vPSI Group have written dozens of articles and papers for the Society of Petroleum Engineers. This year, Norman Ritchie, Angel Simmons, and Tom Knode between them submitted three papers to the upcoming SPE International Health, Safety, Environment, and Sustainability Conference and Exhibition, being held September 12-14, 2024, in Abu Dhabi, United Arab Emirates. Although the papers are too long to present fully here, we share with you a synopsis of each. Feel free to contact us for the full papers.

**Riskwashing Identification and Minimization (SPE-220327):** Riskwashing refers to a situation where an organization engages in superficial or insincere actions to create the appearance of addressing a particular risk or issue, without actually taking substantive action to address the underlying problem. Incident investigations are a common source of activities that can be labeled as “riskwashing.” This paper presents methods to identify and minimize riskwashing as an organizational response to incidents. Activities presented as corrective actions are examined against a simple logical test to determine their value in reducing the risk revealed to the organization by the unplanned event. Study of a large sample of incident investigations across many industries reveals that in a significant number of cases, the activities presented as corrective actions do nothing to reduce the risk revealed to the organization and thus conform to the definition of riskwashing. The simple logical test used to identify riskwashing activities is fully described and can be deployed by organizations to identify and minimize the associated cost impacts and more effectively manage risk.



**A New Safety Culture Assessment Model: Understanding Employee Engagement in a Company's Safety Program (SPE-220481):** To help organizations understand and improve the maturity of their safety culture, assessment tools have been developed to provide insight into the employee's consideration of messaging and programs. However, something that can be missed with these surveys is the assessment of employees' engagement,

*(Continued on page 3)*

## vPSI and ASSP

vPSI consultants are heavily involved in local ASSP chapters. Co-Founder and Director Norman Ritchie and Principal Consultant Angel Simmons were recently honored by the Gulf Coast Chapter of the ASSP with President's Awards. Bruce Pettengill, our newest consultant, is past year chairs of the Professional Development Conference and the Energy Corridor Section. Angel is the Communications Liaison for the Energy Corridor Section of the Gulf Coast Chapter for the second year in a row. She has also been selected as a speaker for several ASSP events as listed below:

- Gulf Coast Chapter Professional Development Conference held in April 2024 at the Norris Conference Center in Houston, Texas
- Energy Corridor Section August Monthly Meeting on August 8th at the Memorial City Conference Room in Houston, Texas
- Region III Professional Development Conference in Hurst, Texas on September 23rd - 25th, 2024

## vPSI and the SPE

In addition to the papers listed above, vPSI has several associations with the Society of Petroleum Engineers. Norman Ritchie and Tom Knode will be presenting these papers at the SPE conference referenced above.

Tom's other involvement includes:

- On the Executive Committee for the conference and advisor to the Safety Sub-Committee.
- Moderating a panel session: Embracing Chronic Unease: A Vital Leadership Behaviour for HSE Excellence.

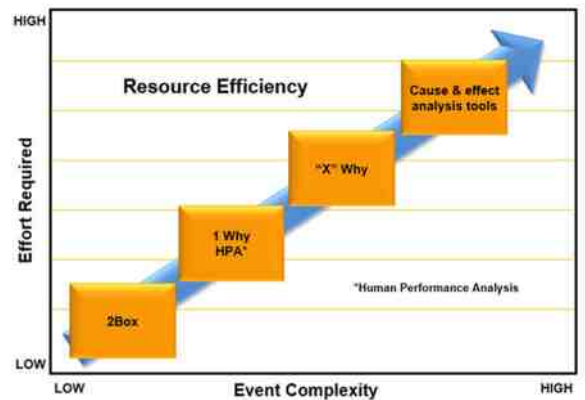
**vPSI's Most Recent SPE Papers**

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along with their trust in management and belief in the company's safety programs. Research has shown a direct link between employee engagement and superior safety performance. If we look at the safety culture maturity of a company through the lens of employee engagement, we should assess culture with a tool designed to understand the level of engagement and barriers to improvement. Using a third-party employee survey tool, new questions were delivered to the organization. These questions included actions and beliefs such as how often employees report incidents, near misses, or stop work when needed. Questions were also designed to identify potential leadership or organizational barriers including how the reports are viewed and valued by those up the chain of command. The survey itself had a decent participation rate. Data was collected for over 50 sites and lent insight into how employees are engaged in safety programs and if they believe and trust the organization to respond appropriately. Some of the results were surprising, including the percentage of employees who stated that they reported all incidents. This proposed model for safety culture maturity can help an organization understand how engaged their employees are in safety, and the potential barriers to that engagement.

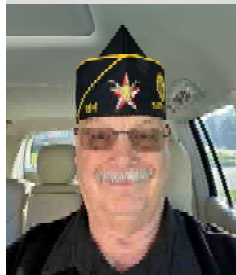
**New Methods for Learning from Incidents Involving Human and Organizational Performance (SPE-220390):**

Human and Organizational Performance (HOP) issues may be complex and can cover a broad range of disciplines. Investigating and learning from incidents from a Human Performance perspective requires a different approach than conventional incident analysis methodologies allow. This paper offers a pragmatic set of concepts that can be applied through the entire process of responding to the learning opportunities presented by incidents, including data acquisition, analysis, and developing appropriate and optimized corrective actions for Human Performance causal factors. The paper is based upon examination of incident investigations carried out for and by a variety of organizations including oil and gas operators and service companies. Study of these events from the HOP perspective reveals shortcomings both in analysis and the resulting activities presented as corrective actions. The paper presents new methods of incident/unplanned event analysis directly applicable to Human and Organizational Performance issues, specifically "2Box Analysis" and "HPA - Human Performance Analysis." This paper is based upon and additive to the Author's 2023/2024 SPE Distinguished Lecturer presentation.



**Philanthropy at vPSI**

Our Canadian director, Rick Theriau, is heavily involved with HOPEthiopia. Through him, vPSI was recently a featured sponsor of their annual golf tournament on July 15th. The team ended with a score of 59 and finished in 3rd place. A great day of golf and laughs was enjoyed by all.



Bruce Pettengill, our newest vPSI consultant, is a Chaplain for the American Legion which is the largest veteran's service organization in the USA. It was incorporated in 1919 to enhance the well being of America's veterans and their families.

Then of course we have our Co-founder Norman Ritchie who has been heavily involved with Houston's SNAP (Spay/Neuter Assistance Program) for years and is their current board President.





## HSE and Risk Consulting



Trust vPSI Group's expert consulting services to deliver in all areas of Risk, Safety, Environment, Sustainability, Health, and Project Management. Our project-specific Solution Teams focus their deep subject matter expertise and considerable experience on our clients' most important and complex issues. This yields resource efficient and effective solutions alongside reduced risk and bottom line impact.

### Why vPSI?

Whether your need is strategic, tactical, or something in between, vPSI consultants have what it takes to get it done, from strategic policy development to detailed field activity risk management. Core competencies include:

- Safety Management Strategies & Systems
- Risk Management
- Program Assessment
- Organizational Learning
- Performance Benchmarking
- ESG
- Land Transportation Risk Management
- Human & Organizational Performance
- OSHA, NFPA, EPA, etc. Compliance
- Process Safety Management
- Incident Investigation
- Project Management
- Chemical and Hazardous Waste Management
- Leadership Coaching
- Culture Measurement & Improvement
- Industrial Hygiene Monitoring



### vPSI People

To execute consulting projects, vPSI forms "Solution Teams" consisting of appropriate combinations of Subject Matter Experts (SMEs). These are highly experienced individuals, often semi-retired from their primary careers, who bring immediate credibility to projects based on their many years of accumulated knowledge and deep technical and industry expertise.

### Industries Served

- ◇ Oil & Gas
- ◇ Pipelines
- ◇ Refining & Chemicals
- ◇ Power Generation
- ◇ Manufacturing
- ◇ Marine
- ◇ Semiconductor
- ◇ Construction
- ◇ Food
- ◇ Transportation & Logistics
- ◇ Biomedical

## Advanced Ideas, Focused Solutions

The answer is yes; now what's your question?